

**MARGARET MIN ATTORNEY AFFIRMATION:**  
**ATTORNEY OF RECORD FOR H.I.D.R.**

I, Margaret Min, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am an immigration attorney at The Legal Aid Society in New York, New York. I represent H.I.D.R. before the Executive Office for Immigration Review. H.I.D.R. has relayed the following information to me.
2. H.I.D.R. is currently detained at the Bluebonnet Detention Center in Anson, Texas. Since he was transferred there on April 14, each day he has seen more and more Venezuelans who are in ongoing immigration proceedings brought there from across the country--- including from Tennessee, Illinois, and Florida. His detention pod currently has 28 Venezuelan men in it. He estimates that at the very least, dozens and dozens more Venezuelan men have arrived recently and are in Bluebonnet with him.
3. H.I.D.R. has ongoing immigration proceedings in Oakdale, Louisiana, where he is pursuing asylum, withholding of removal, and protection under the Convention Against Torture.
4. Like other men moved to Bluebonnet, H.I.D.R. has been accused of being a Tren de Aragua member. He has affirmed that he has never been a member of, or associated with, TdA in any way, that he has never been arrested for or convicted of any crime anywhere in the world, and that he has never been a member or associated with any other criminal organization.
5. H.I.D.R. had previously been detained at Winn Correctional Center. On April 13, 2025, officers there told him and a group of other detained Venezuelan men to pack their belongings for transfer. On April 14, 2025, this group was chained at their hands, waist, and feet and taken to a plane bound for Texas. On the plane, officers accused the group of being members of Tren de Aragua.
6. After landing, H.I.D.R. and the individuals who traveled with him were put on a bus with approximately 50-55 other people from various detention centers from all over the United States. H.I.D.R. believes the majority of the individuals on the bus were Venezuelan, and they were all taken to Bluebonnet. When H.I.D.R. arrived at Bluebonnet, an officer stated that everyone in the group would be deported, though he did not indicate to where.

I declare under penalty of perjury that I am accurately relaying what my client told me and the foregoing is true and correct to the best of my knowledge.

/s/ \_\_\_\_\_

Margaret Min, Esq.

Executed this 16th day of April, 2025